

# ZMO LAW PLLC

January 13, 2023

*Via ECF*

Hon. Richard J. Sullivan  
Southern District of New York  
United States Court of Appeals for the Second Circuit  
500 Pearl Street  
New York, NY 10007

RE: *U.S. v. Darnell Feagins*, 17-cr-377 (RJS) (Violation of Supervised Release)

Dear Judge Sullivan:

This office represents Darnell Feagins in the above-captioned matter which is scheduled for a status conference on January 20, 2023. The parties have conferred, and we anticipate that, with the Court's approval, Mr. Feagins will enter a plea of guilty to Specifications #4, 6 and 8 in the Amended Violation Report filed on December 13, 2022. These specifications charge Mr. Feagins with downloading and using social media applications between April 22 and June 17, 2020, failing to report to his probation officer on July 1, 2020, and possessing child pornography on his cell phone between November 2017 and October 2020.

We respectfully request that Mr. Feagins be permitted to plead to these three counts in full satisfaction of the violation report and be sentenced to three months incarceration and returned to supervised release. Mr. Feagins has pled guilty to possession of child pornography already and faces a mandatory minimum ten-year sentence for that conviction. As described below, Mr. Feagins has suffered [REDACTED] [REDACTED]. While this [REDACTED] does not excuse Mr. Feagins's criminal and violative conduct, it provides necessary context for the offenses Mr. Feagins committed and helps support the lenient additional sentence for the violations that we are requesting.

## *Facts*

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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*Conclusion*

Mr. Feagins recognizes that it is up to him [REDACTED]  
[REDACTED]. He will have a minimum of ten years in prison [REDACTED]

[REDACTED] We respectfully submit that nn additional lengthy sentence on the instant VOSR is unnecessary, unduly harsh, and would be counterproductive.

For the reasons set forth above, we ask the Court to impose a sentence of three months in light of Mr. Feagins' pending sentence of at least ten years imprisonment after his guilty plea.

Very truly yours,

ZMO Law PLLC

By: Zachary Margulis-Ohnuma

Zachary Margulis-Ohnuma

CC: Cecilia Vogel (via email and ECF)